

Exhibit 18

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN

Priorities USA, Rise, Inc., and the
Detroit/Downriver A. Philip Randolph
Institute,

Plaintiffs,

v.

Dana Nessel, in her official capacity as
Attorney General of the State of
Michigan,

Defendant.

NO. 19-13341

JUDGE MARK A. GOLDSMITH

MAGISTRATE JUDGE R.
STEVEN WHALEN

DECLARATION OF ANDY DIDOROSI

I, Andy Didorosi, am over the age of 18 and do hereby declare:

1. I make this declaration on my own personal knowledge of the facts below, which are true and accurate to the best of my knowledge and belief.
2. I was born and raised in Detroit, Michigan, where I currently reside.
3. In 2012, I founded The Detroit Bus Company with the mission of filling public transit gaps. I am currently the president of The Detroit Bus Company, a low profit limited liability company.

4. In 2012, public transportation in Detroit was broken. Bus schedules were unreliable, and it was not uncommon for busses to not make their scheduled stops. Entire Detroit neighborhoods didn't have any bus service at all. This was the case in 2012, and Detroit public transportation continues to face issues to this day.

5. The Detroit Bus Company was not designed to address all of Detroit's public transportation woes, but I believe that filling small gaps can make a big difference.

6. When The Detroit Bus Company first launched, we used three converted former school busses to provide \$5 rides on the same route that the cancelled M1 light rail project (which is now the QLine) was supposed to run. In late 2012, we began working with the Skillman Foundation to provide reliable transportation to afterschool programming for Detroit schoolchildren. And as the years have progressed, The Detroit Bus Company has expanded its offerings to include, among other things, public and private bus tours of Detroit, private charters, and all forms of youth transit.

7. In 2018, The Detroit Bus Company started and ran Vote Bus, a program designed to increase voter turnout in Detroit. Voting is an important part of participation in the democratic process and based on my experience—both as a resident of Detroit and an active participant in the regional transportation industry—

it is my opinion that voter turnout in Detroit is so low because of barriers to reach the polling place. The Detroit Bus Company started Vote Bus to fill this gap.

8. In 2018, Vote Bus provided free rides to the polls for voters in all of Detroit, Highland Park, and Hamtramck, regardless of party affiliation. I believe that Vote Bus reduced barriers to the polls for these citizens; Vote Bus rides were free, and, in most cases, less time consuming than other potential forms of transportation voters could have used, such as walking or making use of Detroit's transit systems.

9. For 2018 Vote Bus, we received contributions from several individual donors. We did not want to expose those individual donors to criminal liability under the Voter Transportation Ban for causing transportation to be hired to take voters to the polls. We informed the public and donors that the 2018 Vote Bus program would run regardless of the number or amount of donations. Individual donations were used to offset funds that The Detroit Bus Company had already dedicated to the 2018 Vote Bus program.

10. We plan to offer Vote Bus for the 2020 general election to help Michigan voters make it to the polls, and we would like to expand the work that Vote Bus did in 2018.

11. As long as the Voter Transportation Ban is in place, we will continue to structure Vote Bus so that its service delivery is independent of the number or

amount of contributions received. But if the Voter Transportation Ban is not in place for the 2020 election, The Detroit Bus Company could use individual donations to augment its Vote Bus budget and provide transportation to the polls for even more Michigan voters.

I certify under penalty of perjury and pursuant to the laws of the United States that the preceding is true and correct.

Executed on January 28, 2020.

By: andrew didorosi
Andy Didorosi



Certificate of Completion

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andy@detroitindie.com		Viewed: 1/28/2020 12:25:36 PM
The Detroit Bus Company		Signed: 1/28/2020 12:25:58 PM
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	Using IP Address: 50.31.198.210	

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Signing Complete	Security Checked	1/28/2020 12:25:58 PM
Completed	Security Checked	1/28/2020 12:25:58 PM

Payment Events

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